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May 13, 2021

VIA ECF

The Honorable Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *U.S. v. Michael Pearse*
Docket 15-CR-616 (AT)

Dear Justice Torres:

I am the attorney for Mr. Pearse. The case is currently on the Court's calendar for **May 20, 2021 at 9:00am** for a change of plea.

I write to request that the change of plea proceed remotely via video conference. Mr. Pearse is currently incarcerated at MDC and he desires that the Court proceed via video. In that regard, I have forwarded to chambers email the necessary executed waivers.

We request that the Court make the necessary finding under the CARES Act pursuant to Sec. 15002(b) (2) of the Act. Due to the continued COVID pandemic and for the health and safety of all parties, the change of plea proceeding cannot be further delayed without serious harm to the interests of justice.

Should the Court require any further information, it will be provided forthwith.

Sincerely,

/s/ Daniel F. Lynch

Daniel F. Lynch (DL-3025)
Attorney for Michael Pearse

cc: AUSA Olga Zverovich (via email and ECF)